

EXHIBIT

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Haaz, Sam

From: Haaz, Sam
Sent: Tuesday, February 4, 2025 3:39 PM
To: Elisa M. Boody
Cc: SMBSIG
Subject: Follow-Up

Elisa,

It was nice speaking with you just now regarding Cabela's Rule 26 disclosures. You indicated that by Friday, Cabela's would supplement its initial disclosures and provide additional witness information which may include: Chuck Ricketts who sold Mr. Hall the subject firearm, Mr. Rickett's store manager, and the Cabela's employee(s) that signed the Vendor Agreement with Sig Sauer.

You also indicated that you would provide additional 26(a) documents, including the 2017 Vendor Agreement, the modified 2017 Vendor Agreement, and the 2018 Vendor Agreement with Sig Sauer.

Regarding insurance, you agreed to provide the endorsement pages / declaration pages for the named Cabela Defendants. You advised that certain entities are likely not properly in the case (TCMB and Bass Pro World)

You indicated that you needed more time to answer discovery, and we scheduled a meet and confer on Tuesday, 2/11, regarding the results of your search for relevant ESI. You indicated you would search emails for the custodians who signed the Vendor Agreements, and emails received by Cabela's during the relevant time period (July 2017 – Oct 2017) from an @sigsauer.com domain. We reserve the right to expand that time period and custodians based upon what documents or information are learned in discovery.

Considering Plaintiff served discovery at the end of December, and Plaintiff has already provided an extension, please provide responses to Plaintiff's written discovery on or before February 14, 2025. Thank you.

Samuel A. Haaz, Esq.



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